

United States District Court  
Northern District of California

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RENÉ QUIÑONEZ and  
MOVEMENT INK LLC,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. 3:22-cv-03195-WHO

**STIPULATED REQUEST  
REGARDING BRIEFING SCHEDULE**

Judge: Hon. William H. Orrick

Pursuant to Local Rule 6-2, Plaintiffs and Defendant United States respectfully stipulate to and request an alteration of the briefing schedule related to Defendant's pending motion to dismiss Plaintiffs' fourth amended complaint, for the reasons and in the manner set forth below. This is the first request for a modification of time as to the pending motion.

Defendant filed the pending motion on August 29. That makes Plaintiffs' opposition due September 12. A combination of the holiday weekend, simultaneous work obligations, and simultaneous family obligations for Plaintiffs' lead counsel make the September 12 deadline difficult to meet. Additionally, Plaintiffs intend to move for partial summary judgment as to Count 1 contemporaneously with their opposition to Defendant's motion to dismiss. Because some of the legal issues implicated by those two motions will overlap, the parties believe it makes sense in the interest of conservation of resources for both to be heard simultaneously. So, taking account of the Court's scheduling rules (which require Plaintiffs' motion to be heard at least 35 days after filing) and the availabilities of the parties and the Court, the parties propose the following briefing and hearing schedule:

**September 20:** Plaintiffs file (1) opposition to Defendant's pending motion to dismiss the fourth amended complaint and (2) Plaintiffs' intended motion for partial summary judgment as to Count 1.

**October 4:** Defendant files (1) reply in support of the motion to dismiss and (2) opposition to the motion for partial summary judgment.

**October 11:** Plaintiff files reply in support of the motion for partial summary judgment.

**October 30:** Court's hearing on both motions.

A proposed order is appended hereto, and a declaration of Plaintiffs' counsel accompanies this stipulation.

1 Dated: September 6, 2024

2 s/ Jaba Tsitsuashvili  
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21 **THE PARTIES' STIPULATION AS TO THE PROPOSED BRIEFING AND HEARING**  
22 **SCHEDULE ABOVE IS GRANTED.**

23 Dated: September 11, 2024

24 s/ Michael A. Keough (with permission)  
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29   
30 Hon. William H. Orrick  
31 United States District Court Judge